

Exhibit A

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<i>Paragraph</i>	<i>Allegation</i>
71.	Upon information and belief, from December 2016 through May 2017 representatives of the Mahwah Council, including the Mayor, regularly visited and conferred with the Polo Club regarding action to take against Ramapough's use of Sweet Water.
72.	Upon information and belief, the Polo Club hired a public relations firm to pursue their agenda against the Ramapough. On June 1, 2017, defendant Polo Club's agent Jeanine Genauer of the JPR Group wrote a letter to the editor which appeared on northjersey.com falsely accusing Ramapough of violations of New Jersey state regulations.
73.	Defendant Polo Club, in furtherance of its campaign to interfere with the Tribe's religious practice and to drive the Ramapough off their land, has made numerous unfounded and malicious complaints to the Township's police department, using the New Jersey municipal "private warrant" process to bring criminal charges against Ramapough members. For example, the Polo Club made a criminal complaint against Chief Dwaine Perry for allegedly tampering with the surveillance cameras directed at Ramapough land. Surveillance footage showed no such occurrence, and the Bergen County Superior Court later found that Chief Perry "did not touch, let alone tamper" with the Polo Club's cameras. ¹
74.	Members of the Polo Club have treated the Ramapough with hostility and rank prejudice. Some Polo Club members have publicly shouted racist and disturbing language at Plaintiffs, sometimes during Ramapough religious ceremonies and prayers. Hateful comments directed at the tribe in 2016 and 2017 include the following xenophobic and racist statements[.]
75.	On multiple occasions, green bags of dog feces were found in the Sweet Water driveway, as if someone had intentionally thrown them there.
76.	Members of the [HOA] maintain surveillance cameras directed toward Ramapough property 24 hours a day, and have trespassed on Ramapough land to threaten, photograph, and record Tribe members. In an effort to restrict Plaintiffs' use of their own land, Polo Club members have also publicly demanded that the Township impose fines and jail time on Ramapough members.
77.	Agents of the [HOA] have also taken to using the Mahwah police department to enforce their vicious campaign of harassment against the Ramapough. In one instance in October 2016, Paul Scian, the President of

¹ What the surveillance footage showed was that Perry was the "wheel man" who drove Smith to the site. He was acquitted on a technicality, but was not exonerated of the alleged conduct.

	the Polo Club, gave members of the tribe permission to use electricity from the front of an electricity box by the Ramapough property. The next month, several police cars came to Sweet Water to investigate a complaint from Mr. Scian that the tribe was stealing electricity.
78.	On January 5, 2018, Mahwah, by Township attorney Brian Chewcaskie, told a Bergen County Superior Court that Mahwah was prepared to act unilaterally without a Bergen County Superior Court order to prohibit prayer by the Ramapough through “self-help”. . . .
79.	Mahwah’s order to show cause, which was denied by the State Court, demanded the physical removal of . . . any and all structures building violation of Township’s zoning ordinance and/or the NJDEP Flood Hazard Area Control Act.
80.	At a March 22, 2018 Town Council meeting, Mahwah Town Council President Robert Hermansen said, “[i]t’s time to move forward one way or the other.” Later, Mr. Hermansen suggested, “[d]o we go in and take the rocks down oursel[ves]?” At that same Council meeting, [HOA] member Charles Brammer said, “[w]e need something done. Not a year from now. Not six months from now. It better be done now. We’re tired of it.”
81.	Upon information and belief, Mahwah and the [HOA] have conspired to induce the Ramapough to sell sacred lands along the Ramapo River at 95 Halifax Road. A prominent [Association] member even threatened the tribe, stating that if they did not sell Sweet Water for a materially low price, the [Association] was “prepared to do something bad.” Days later, frivolous criminal charges were brought against the Ramapough chief.
82.	The [Association] has instituted numerous unfounded lawsuits against Ramapough in Bergen County Superior Court as part of their campaign to apply pressure against Plaintiffs. Mahwah has similarly instituted litigation against Ramapough, and attorneys for the [HOA] have sought to directly intervene, and in some instances actually assisted and participated in, these lawsuits in which they had no official role. The purpose of all these actions taken jointly and individually by the Town and the [HOA] have been to burden, harm and destroy the Plaintiffs’ religious uses of their property. Indeed, upon information and belief, agents of the [HOA] communication with agents of Mahwah as frequently as once per day, collaborating to prevent Ramapough prayer and assembly.